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July 6, 2023

VIA EMAIL

Honorable Lisa G. Beckerman
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Rm. 623
New York, NY 10004-1408

Re: Erbo Properties LLC et al (the “Debtors”)
Case No. 23-10210

Dear Judge Beckerman:

I am proposed substitute counsel to the Debtors.

With reference to the discovery conference scheduled for tomorrow I wanted to advise the Court that the Debtors will be filing today an application seeking to extend, for cause, the deadlines in your June 28, 2023 Scheduling Order. As noted in my email appended to Mr. Bauer’s letter to you of today, the Debtors are attempting to properly document all items needed to go forward with a game-changing lease to house migrants on the Debtors’ Property. The tenant would pay the Debtors \$10.15 million plus taxes annually for three years. Because of the late emergence of this opportunity the Debtors need additional time to amend the plan and disclosure statement.

Sincerely,

/s/Isaac Nutovic
Isaac Nutovic

cc: All Counsel